

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

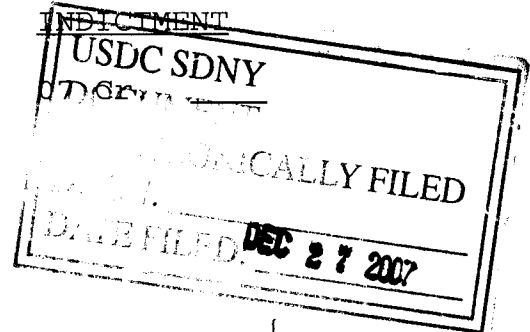
.07 CRIM 1228

UNITED STATES OF AMERICA :

- v. - :

CAROLINE ULL, :
a/k/a "Ellen Ultang," :

Defendant. :



COUNT ONE

The Grand Jury charges:

1. From in or about 1984, up to and including in or about October, 2007, in the Southern District of New York and elsewhere, CAROLINE ULL, a/k/a "Ellen Ultang," the defendant, unlawfully, willfully, and knowingly did travel in interstate commerce with the intent to kill, injure, harass, and intimidate another person, and in the course of, and as a result of, such travel did place that person in reasonable fear of the death of, and serious bodily injury to, and did cause substantial emotional distress to, that person, a member of the immediate family of that person, and the spouse of that person, to wit, ULL traveled interstate to visit the apartment building of an individual, to harass and intimidate the individual, thereby placing the individual in reasonable fear of the death of, and serious bodily injury to, himself and his immediate family and causing him and his family substantial emotional distress.

(Title 18, United States Code, Section 2261A(1).)

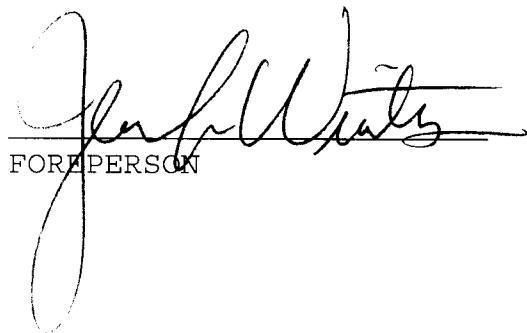
COUNT TWO

The Grand Jury further charges:

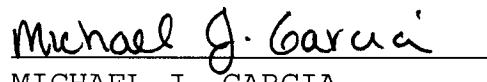
2. From in or about 1984, up to and including in or about October, 2007, in the Southern District of New York and elsewhere, CAROLINE ULL, a/k/a "Ellen Ultang," the defendant, unlawfully, willfully, knowingly, and with intent to kill, injure, harass, and intimidate, and cause substantial emotional distress to a person in another State, and with the intent to place a person in another State in reasonable fear of the death of, and serious bodily injury to, that person, a member of the immediate family of that person, and a spouse of that person, did use the mail, an interactive computer service, and a facility of interstate commerce to engage in a course of conduct that did cause substantial emotional distress to that person and did place that person in reasonable fear of the death of, and serious bodily injury to, that person, a member of the immediate family of that person, and a spouse of that person, to wit, ULL, who lived in a different state than her victims, sent harassing and threatening communications in the form of letters, packages, electronic messages, and telephone communications to an individual and his family, and caused the individual substantial

emotional distress, and placed the individual in reasonable fear of the death of, and serious bodily injury to, himself and his immediate family.

(Title 18, United States Code, Section 2261A(2).)



FOR PERSON



MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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a/k/a "Ellen Ultang,"

Defendant.

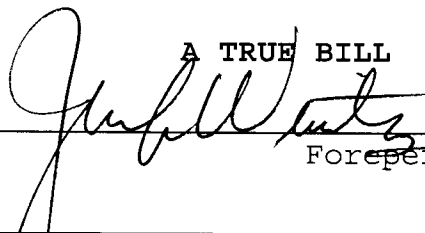
INDICTMENT

07 Cr.

(18 U.S.C. § 2261A)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

12/27/07 P.H. [unclear] Post/HF07 This case was
referred to Judge Helgeson & all
proper.
P.H. Judge Helgeson